

VANDERSLICE DECL. EXHIBIT A12

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

DECLARATION OF ADAM MEHES

Adam Mehes declares and states as follows:

1. I am an employee of non-party X Corp. I have personal knowledge of the facts set forth in this declaration and could testify competently as to the matters set forth in this declaration.

2. Based on my personal knowledge and on information provided to me by others at X Corp., I understand that the parties to the above-captioned litigation have submitted to the Court certain information that X Corp. has designated as Confidential or Highly Confidential under the Stipulated Protective Order dated July 11, 2022. Specifically, portions of the July 27, 2023 Declaration of Dr. Nicholas Economides in Support of Consumer Plaintiffs' Motion for Class Certification Errata ("Economides Declaration") and the August 25, 2023 Expert Report of Yael Hochberg, PHD Errata ("Hochberg Report") refer to these materials.


3. X Corp. believes that good cause and compelling reasons exist to keep the following X Corp.-related portions of the Economides Declaration and Hochberg Report under seal:

Document	Portion to Remain Under Seal
Economides Decl. p. 55, ¶ 175	The employee's name in footnotes 229 and 230
Economides Decl. p. 56, ¶ 177	From "Indeed" to the end of the paragraph and including the employee's name in footnote 231 and the entirety of footnote 232
Economides Decl. p. 56, ¶ 178	From "As [the employee's name]" to the end of the paragraph and including footnote 233
Economides Decl. p. 56, ¶ 180	From "Twitter itself" to "open ecosystem" and including footnotes 236 and 237
Economides Decl. p. 57, ¶ 180	From "Similarly, a Twitter" to the end of the paragraph and including the employee's name in footnote 240 and the entirety of footnotes 242, 243, and 244
Economides Decl. p. 58, ¶ 184	From "Indeed" to the end of the paragraph and including footnote 253
Hochberg Report p. 15, ¶ 34	From "that allows" to the end of the sentence and including footnote 34

4. The above-referenced material reflects non-public market and/or product feature analysis, privacy information, and other confidential information belonging to X Corp. This information is highly sensitive, and X Corp. takes very seriously the need to keep such information confidential. X Corp. believes that the disclosure of this information would be competitively damaging to X Corp. because, among other reasons, it would give confidential information about X Corp. and its market and product feature analysis to X Corp.'s competitors. This information is also potentially damaging to X Corp. employees.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on: 03 November 2023

DocuSigned by:

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Adam Mehes
Senior Director, Legal, X Corp.